

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; BASIC BRANDS, INC., an Ohio corporation; THE HEALTH & WELLNESS CENTER, INC., d/b/a DR. BERG NUTRITIONALS, a Virginia corporation; and VIMERGY, LLC, a Florida limited liability company,

Plaintiffs,

v.

NATASHA MINI, an individual; MEGAN PRESSOTTO, an individual; DANIELLE MINUCCIANI, an individual; M2 NIKN LLC, a California limited liability company; STRATEGIQUEST INC., a California corporation; SHERYL ANN PARAL, an individual; ANDREA LOIS KEY, an individual, d/b/a "Key Strong Fitness Inc" Selling Account; KEY STRONG FITNESS INC., a Georgia corporation, d/b/a "Key Strong Fitness Inc" Selling Account; SARA M. JOHNSON, an individual, d/b/a "May Flowers Health Group Inc" Selling Account; MAY FLOWERS HEALTH GROUP INC., an Illinois corporation, d/b/a "May Flowers Health Group Inc" Selling Account; GENTRY FARLEY, an individual, d/b/a "Far Tec Gadgets Inc" Selling Account; FAR TEC GADGETS INC., a New York corporation, d/b/a "Far Tec Gadgets Inc" Selling Account; JILL MARIE JUNGHEIM, an individual, d/b/a "Jungle Accessories Inc."

No. 2:23-cv-01718-TL

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' *EX PARTE* MOTION
FOR EXPEDITED DISCOVERY**

[PROPOSED] ORDER GRANTING PLAINTIFFS'
EX PARTE MOTION FOR EXPEDITED DISCOVERY - 1
(2:23-cv-01718-TL)

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1 Selling Account; JUNGLE ACCESSORIES
 INC., a California corporation, d/b/a “Jungle
 2 Accessories Inc.” Selling Account;
 SALVATORE VITALE, an individual, d/b/a
 3 “Rising Brook inc” Selling Account; RISING
 BROOK INC., a Florida corporation, d/b/a
 4 “Rising Brook inc” Selling Account; ALEC
 JOSEPH ORGERA, an individual, d/b/a
 5 “Living Orgera Live Inc” Selling Account;
 LIVING ORGERA LIVE INC., a North
 6 Carolina corporation, d/b/a “Living Orgera Live
 Inc” Selling Account; DONNA MARIE
 7 JACKSON, an individual, d/b/a “Jackson
 Marketing Grp Inc” Selling Account;
 JACKSON MARKETING GROUP, INC., an
 8 Oregon corporation, d/b/a “Jackson Marketing
 Grp Inc” Selling Account; BENJAMIN RAHE,
 9 an individual, d/b/a “B. Rahe Gadgets Inc”
 Selling Account; B. RAHE GADGETS INC.,
 10 an Ohio corporation, d/b/a “B. Rahe Gadgets
 Inc” Selling Account; EDDY VILLASECA, an
 11 individual, d/b/a “Villaseca Marketing Group
 Inc” Selling Account; VILLASECA
 12 MARKETING GROUP, INC., a Texas
 corporation, d/b/a “Villaseca Marketing Group
 Inc” Selling Account; HANNAH HESS POPE,
 13 an individual, d/b/a “HHP Media Group Inc”
 Selling Account; HHP MEDIA GROUP, INC.,
 14 a Louisiana corporation, d/b/a “HHP Media
 Group Inc” Selling Account; ROBERT KOLE
 15 SCHREIBER, an individual, d/b/a “Schreiber
 Marketing Group Inc” Selling Account;
 16 SCHREIBER MARKETING GROUP, INC., a
 Georgia corporation, d/b/a “Schreiber
 17 Marketing Group Inc” Selling Account; and
 18 DOES 1-10,
 19

20 Defendants.

21 THIS MATTER came before the Court on the *ex parte* motion by Plaintiffs
 22 Amazon.com, Inc., Amazon.com Services LLC, Basic Brands, Inc. (“Basic Brands”), The Health
 23 & Wellness Center, Inc., d/b/a Dr. Berg Nutritionals (“Dr. Berg”), and Vimergy, LLC
 24 (“Vimergy” and collectively, “Plaintiffs”) for leave to serve expedited discovery on third parties
 25 (the “Motion”). The Court has considered the Motion, supporting declarations, and the governing
 26 law.
 27

Accordingly, it is hereby ORDERED that Plaintiffs' *Ex Parte* Motion for Expedited Discovery is GRANTED as follows:

Plaintiffs are granted leave, prior to the Rule 26(f) conference, to serve Rule 45 subpoenas to obtain information from the following third parties:

- Fulfillplex and Sean Johnson for all documents and correspondence related to Defendant Sheryl Ann Paral ("Paral"), the StrategiQuest Defendants,¹ the Selling Accounts² and those responsible for them, the manufacture, sale, supply, storage, shipping, distribution, transport, logistics support, or any other related service provided in connection with purported Basic Brands, Dr. Berg, and/or Vimergy-branded products; and
- JP Morgan Chase Bank, Wells Fargo Bank, and Bank of America for all records relating to the bank accounts linked to the Selling Accounts, as identified in **Exhibit A** to the Declaration of Robert Garrett (Dkt. 31), including ~~without limitation~~, any (1) account opening documents, (2) account/credit card/debit card statements, and/or (3) documents reflecting deposits, withdrawals, and balances.

To the extent Plaintiffs identify additional entities or individuals in subpoena responses as having responsive information related to the identity or location of Defendant Paral or other bad actors responsible for the counterfeiting scheme alleged in the Complaint, Plaintiffs will seek leave from the Court to serve additional Rule 45 subpoenas on those entities or individuals.

Dated this 12th day of June 2024.



Tana Lin
United States District Judge

¹ The "StrategiQuest Defendants" are StrategiQuest Inc., M2 Nikn LLC, and their principals, Natasha Mini, Megan Pressotto, and Danielle Minucciani.

² The "Selling Accounts" are: (1) "Key Strong Fitness Inc"; (2) "May Flowers Health Group Inc"; (3) "Far Tec Gadgets Inc"; (4) "Jungle Accessories Inc."; (5) "Rising Brook inc"; (6) "Living Orgera Live Inc"; (7) "Jackson Marketing Grp Inc"; (8) "B. Rahe Gadgets Inc"; (9) "Villaseca Marketing Group Inc"; (10) "HHP Media Group Inc"; (11) "TAJV Media Group Inc"; and (12) "Schreiber Marketing Group Inc."

Presented by:

DAVIS WRIGHT TREMAINE LLP
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s/ Scott R. Commerson

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